

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MICHAEL ROARTY-NUGENT,

Plaintiff,

vs.

CUYAHOGA COUNTY, et al.

Defendants.

)
) CASE NO.: 1:20-CV-01025
)
) JUDGE: J. Philip Calabrese
)
)
) **DEFENDANT CUYAHOGA COUNTY’S**
) **UNOPPOSED MOTION FOR**
) **EXTENSION OF THE DEADLINE TO FILE**
) **STIPULATED DISMISSAL**
)

Now comes the Defendant Cuyahoga County (“County”) to request an extension on submitting the Stipulation of Dismissal to December 16, 2022. The Plaintiff and the County parties diligently negotiated and fully executed settlement agreement and release of all claims on November 6, 2022. The settlement agreement provides that the parties will file a joint stipulation of dismissal after Plaintiff receives payment of the settlement sum.

The County is processing the payment through its treasury management procedures, and the payment will issue in short order. However, the County is concerned that delivery of the payment will not occur before the deadline to file the Stipulation of Dismissal on November 28, 2022. The parties have conferred, and Plaintiff does not oppose an extension on submitting the stipulated dismissal to afford the County with the additional time necessary to complete the processing of payment.

For the foregoing reasons, Cuyahoga County requests that the Court grant an unopposed extension to submit a Stipulation of Dismissal until December 16, 2022.

Respectfully Submitted

s/Mark R. Musson

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